



Kaplan Martin LLP
1133 Avenue of the Americas
Suite 1500
New York, NY 10036

(212) 316-9500
rkaplan@kaplanmartin.com

January 30, 2025

BY CM/ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Carroll v. Trump, 20 Civ. 7311 (LAK)
Carroll v. Trump, 22 Civ. 10016 (LAK)

Dear Judge Kaplan,

We write in brief response to the letters from Hecker Fink dated January 29, 2025. (ECF 347, 226)

We agree with Hecker Fink that the firms have agreed upon a mechanism for determining any amounts due to Hecker Fink based on their charging liens. We note, however, that even that process is unlikely to take place anytime soon since both law firms have agreed to forego any contingency fee payment in connection with the jury verdict at the first trial.

We reiterate our position that in the unlikely event that there is any dispute between the two law firms about the charging liens that could be resolved in court, this Court should decline to exercise jurisdiction over any such dispute.

Respectfully Submitted,



Roberta A. Kaplan, Esq.

cc: Counsel of Record (by ECF)